



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 6, 2021

BY ECF

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Mircea Constantinescu, Nikolaos Limberatos, Cristian Costea, Alin Hanes Calugaru, Ionela Constantinescu, Peter Samolis, and Iuliana Mihailescu, 19 Cr. 651 (LTS)*
United States v. Florian Claudiu Martin, S1 19 Cr. 651 (LTS)
United States v. Alexandru Radulescu, S4 19 Cr. 651 (LTS)

Dear Chief Judge Swain:

The Government respectfully submits this letter to request that the Court set a trial date in this case.

The Government has conferred with counsel for defendants Mircea Constantinescu, Nikolaos Limberatos, Cristian Costea, Alin Hanes Calugaru, Ionela Constantinescu, Peter Samolis, Iuliana Mihailescu, Florian Claudiu Martin, and Alexandru Radulescu. In light of defense counsel's schedules, the Government requests, without objection from the aforementioned defendants, that a trial for those defendants be scheduled to begin on June 20, 2022, if convenient to the Court. Although discussions with certain of these defendants regarding potential pretrial dispositions are ongoing, the Government wants to assure that any of the foregoing defendants who remain in the case by June 2022 are able to proceed to trial at that time (subject to any limitations that the Court may have regarding the number of defendants who may be tried together).

In addition to the aforementioned defendants, the two other defendants whose cases remain unresolved are David Georgescu and Daniel Silvu Camaras. The Government and counsel for Mr. Georgescu are in the process of finalizing a pretrial disposition. Mr. Camaras only recently was arrested in connection with this case. Accordingly, the Government does not request that the above-requested trial date apply to either of those two defendants.

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Respectfully submitted,

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

By: Robert B. Sobelman
Elizabeth A. Hanft
Samuel P. Rothschild
Robert B. Sobelman
Assistant United States Attorneys
(212) 637-2334/2504/2616

cc: All Counsel of Record (by ECF)

The Court hereby sets a target trial date of June 20, 2022 at 9:30 AM, for remaining defendants enumerated in the second paragraph of the foregoing letter. Under the Court's current trial protocols, no trial date will be able to be assigned or confirmed before the first quarter of 2022. The parties are also hereby notified that the cases of any defendants who will go to trial will be transferred to another judge of the Court, in light of the undersigned's ongoing obligations in connection with the PROMESA financial restructuring proceedings for Puerto Rico. The Court finds pursuant to 18 U.S.C. §3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through June 20, 2022, outweigh the best interests of the public and the defendants in a speedy trial because of the need for time for further discussions, possible motion practice and trial preparation.

The Government and the remaining defendants are directed to file a joint status report by February 1, 2022, regarding whether and to what extent a trial is expected to be necessary, and how many days should be set aside for such trial.

SO ORDERED.

10/7/2021

/s/ Laura Taylor Swain, Chief USDJ